

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

RENEE MASON,

Plaintiff,

-against-

TARGET CORPORATION,

Defendant.

Docket No.: 21 cv 2414

NOTICE OF REMOVAL

**TO THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK:**

Defendant, Target Corporation (hereinafter “Target”), for the removal of this action from the Supreme Court of the State of New York, County of Kings, to the United States District Court for the Eastern District of New York, respectfully shows this Honorable Court:

FIRST: Target Corporation is a defendant in a civil action brought in the Supreme Court of the State of New York, County of Kings, entitled:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

RENEE MASON,

Plaintiff,

-against-

TARGET CORPORATION,

Defendant.

Index No.: 524157/2020

SECOND: A copy of the Summons and Verified Complaint in this action is annexed hereto as **Exhibit “A”**. A copy of Target’s Verified Answer is annexed hereto as **Exhibit “B”**. These exhibits constitute all pleadings and orders served upon any party in this action.

THIRD: Plaintiff has served a Response to Demand Pursuant to CPLR 3017(c) (“Response”), a copy of which is annexed hereto as **Exhibit “C”**. Plaintiff’s Response was served on April 26, 2021, and therefore less than thirty (30) days have passed since receipt of the Response.

FOURTH: Plaintiff’s Response demands judgment against Target in the amount of \$3,000,000.00, accordingly, it is clear that the amount of controversy in this matter exceeds \$75,000, exclusive of interests and costs.

FIFTH: This action is one over which this Court has original jurisdiction under the provisions of Title 28, United States Code, Section 1332, and is one which may be removed to this Court by Target, pursuant to the provisions of Title 28 United States Code, Section 1441. Specifically, this action may be removed because it is a civil action brought in a Supreme Court of the State of New York, by a citizen of the state of New York, against a foreign corporation whose principal place of business is outside of the State of New York with the amount in controversy exceeding the sum or value of \$75,000, exclusive of interest and costs.

WHEREFORE, the defendant, Target Corporation prays that the above action now pending against it in the Supreme Court of the State of New York, County of Kings, be removed from there to this Court.

Dated: New York, New York
April 30, 2021

CONNELL FOLEY LLP

A handwritten signature in black ink, appearing to read "Michael B.", is written over a horizontal line.

MICHAEL J. CROWLEY
MICHAEL BOJBASA
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TO: Mark J. Linder, Esq.
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